

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION

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|---------------------------|---|-----------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No.: 3:20-cr-30100 SMY |
| |) | |
| PHILIP REIS, |) | |
| |) | |
| Defendants. |) | |

MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW Defendant, Philip Reis, by and through counsel, and moves this Court pursuant to 18 U.S.C. 3145 § (a)(2) to modify condition (r) of the conditions of release imposed on July 1, 2020 by replacing Home Detention with a Curfew allowing Defendant to be out of his residence between the hours of 8am and 6pm. In support of this motion, Defendant states as follows:

1. Defendant is charged with a single count of Attempted Enticement of a Minor.
2. On July 1, 2020, this Court admitted Defendant to bail on a combination of conditions of release, determining that the conditions imposed would reasonably assure both his appearance at trial and the safety of the community.
3. Condition (r) is among the conditions imposed by this Court. Condition (r) consists of multiple components, among them, being various forms of restrictions on Defendant's movement.
4. Defendant was placed on Home Confinement and now requests this Court modify that placement to a Curfew allowing Defendant to be out of his residence between the hours of 8am and 6pm.

5. The sole purpose for this request is related to Defendant's medical condition. Defendant has numerous doctor appointments that often require last minute follow-ups. These appointments all require approval from the probation office which can be difficult to obtain on short notice.
6. Defendant has adhered to all of his conditions of release for nearly seven months without a violation.
7. Defendant, through counsel, has discussed this matter with Probation Officer, Brenda Tate. Ms. Tate has no objection to Defendant's request.
8. Defendant, through counsel, has discussed this matter with assistant United States attorney, Alexandria Burns. Ms. Burns has no objection to Defendant's request.

WHEREFORE, Defendant respectfully requests this Court modify the conditions of release imposed on July 1, 2020 by replacing Home Detention with a Curfew that would allow Defendant to be out of his residence between the hours of 8am and 6pm.

Respectfully submitted,

By: /s/ Marc Johnson
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CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2021, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Alexandria Burns, assistant United States attorney.